In the Matter of)	
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Telecommunications Relay Services)	
and Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	
Disabilities)	
_____)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of the Telecommunications Relay Services

("TRS") operations of its subsidiary, Sprint Communications Company L.P., and pursuant to the

Commission's *Public Notice,* DA 02-1826 released July 29, 2002, in the above-captioned

proceeding, hereby respectfully submits its comments on the Commission's proposed

clarification of the "procedures for routing emergency calls by telecommunications relay

services (TRS) centers." According to the *Public Notice*, such clarification may be necessary

because Section 64.604(a)(4) of the Commission's Rules, 47 C.F.R. §64.604(a)(4), requires that

relay providers "automatically and immediately transfer the [emergency] caller to the nearest

Public Safety Answering Point (PSAP)." However, in the decision in which such requirement

was adopted, *Telecommunications Relay Services and Speech-to Speech Services for Individuals*

with Hearing and Speech Disabilities, 15 FCC Rcd 5140 (2000) (*Improved TRS Decision*), "the

Commission discussed routing emergency TRS calls to the most *appropriate...*PSAP." *Public*

Notice at 1 (emphasis in original). Thus, the Commission has asked for comments on whether it

should amend its rules to require that TRS providers "transfer [an emergency] call to the most

appropriate PSAP." *Id.* (emphasis in original).

The Commission does not explain, either in the *Public Notice* here or in the text of its *Improved TRS Decision*, what it considers to be the "most appropriate PSAP." Currently Sprint routes the emergency calls it receives at its relay centers -- and given the fact that PSAPs must be able to handle calls directly from the hearing and speech impaired, the number of emergency calls that Sprint handles through relay is *de minimis*[1] -- to the nearest PSAP using the V&H coordinates of the emergency caller's NPA. In some cases, Sprint will be informed by the PSAP receiving the relay call that it is no longer the nearest PSAP to the caller and will transfer the call to the nearest PSAP. Sprint will then update its PSAP database accordingly. This system is working well, and it does not appear to have produced any untoward effects on the ability of any emergency caller to a TRS relay center to be connected to the PSAP that is best able to respond the caller's emergency in a timely fashion. Thus, if the Commission defines the "most appropriate PSAP" to be the "nearest PSAP," there is no need to change the wording of Section 64.604(a)(4), especially since the use of the term "appropriate" instead of "nearest" introduces an element of imprecision into the rule.

Of course, the Commission's request for comments here suggests the possibility that the Commission believes that a criterion other than distance should be used to determine the PSAP to which an emergency call should be routed by a TRS provider. Again the Commission does not provide any guidance here; but, Sprint believes that using a criterion other than the "nearest PSAP" would be highly problematic. This is especially the case if the Commission were to define the "most appropriate PSAP" as the one to which the emergency call of a hearing person (or for that matter a hard-of -hearing person who directly dials 911 instead of going though the

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[1] In 2001, Sprint handled approximately 27,000,000 relay calls. Of that total, less than one-twentieth of a percent were emergency-type calls.

relay center) living in the same area as the TRS user is routed by that person's LEC.[2]

It is Sprint's understanding that the LEC uses the customer's address to program its end office switches to automatically route the emergency call of end user to the PSAP. Using the end user's address enables the LEC to not only route the call to the PSAP in the jurisdiction in which the end user making the emergency call is located but also to the PSAP that the jurisdiction has designated to receive emergency calls from the end user's calling location.[3] Sprint's relay operation simply does not have access to that type of information and, as stated, uses the NPA-NXX of the end user to route the emergency call. Most of the time use of the NPA-NXX enables Sprint to send the caller to the same PSAP as the LEC. However this may not always be the case, especially where serving area of the NPA-NXX overlaps jurisdictions or when the designated PSAP for location of the end user has changed. Although Sprint will, as stated, update its PSAP database to ensure that the next emergency call to its relay center from the user's location will be routed to the PSAP designated to receive emergency calls from the LEC had the caller dialed 911 directly, it cannot, absent access to the type of information used by the LEC for routing the call, be able to send the call to the such designated PSAP in every instance.

Thus if the criterion to be used for determining the "most appropriate PSAP" is based on the LEC emergency call routing, the Commission will need to require that the LECs develop systems that would permit them to furnish to the relay provider(s), on a real time basis, the information used by the LECs for routing emergency calls. Moreover, each relay provider will have to develop systems necessary to enable it to accept such data feeds from the LECs. The development of such systems will take time. Of equal if not greater importance, the cost of

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[2]   CLECs provide 911 services through the ILEC.
[3]   Such designations may be modified from time to time.

developing such systems is likely to run into the millions. The question then boils down to whether such costs are outweighed by any benefits that would be realized by modifying the rule to require that relay providers route emergency calls to the "most appropriate PSAP" as defined above. Sprint believes that under such cost/benefit analysis, such modification cannot be justified. As stated, the number of emergency-type calls that Sprint handles at its relay centers is *de minimis*, and in any event, Sprint's current routing procedures are working well.

Accordingly, Sprint respectfully recommends that the Commission allow the current provision governing the routing of emergency calls by relay providers to stand.

Respectfully submitted,
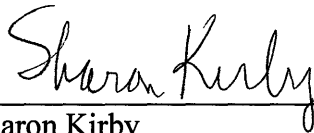
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August 29, 2002

CERTIFICATE OF SERVICE

       I hereby certify that a copy of the foregoing **COMMENTS OF SPRINT CORPORATION** was sent by e-mail or by United States first-class mail, postage prepaid, on this the 29th day of August, 2002 to the parties on the attached list.

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August 29, 2002

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